

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL No. 16-2738 (MAS) (RLS)

Motion Day: July 7, 2025

THIS DOCUMENT RELATES TO ALL CASES

**THE PLAINTIFFS' STEERING COMMITTEE'S MOTION TO
COMPEL NON-PARTY PLOS ONE'S COMPLIANCE WITH SUBPOENA**

PLEASE TAKE NOTICE that, at 9:00 a.m. on July 7, 2025, or at such other time as set by the Court, Plaintiffs, by and through the Plaintiffs' Steering Committee (PSC), will Move to Compel Non-Party Public Library of Science ("PLOS") to Comply with the subpoena issued by Plaintiffs on March 20, 2024.

As fully discussed in Plaintiff's Memorandum of Law in Support of this Motion, the Court should compel PLOS to comply because the discovery sought is relevant, proportional, and nonprivileged.

Plaintiffs respectfully request that the Court grant the Motion to Compel. A proposed order is attached for the Court's consideration.

Dated: May 23, 2025

Respectfully submitted,

/s/ P. Leigh O'Dell

P. Leigh O'Dell

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CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

Respectfully submitted,

/s/ P. Leigh O'Dell

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